

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

General John T. Chain, Jr. (USAF, Retired),)
)
)
Plaintiff,)
)
vs.) Case No. 07 C 6317
)
Lake Forest Partners, LLC, Christopher T.) Judge Guzman
French, Albert J. Montano, and Mark D.) Magistrate Judge Mason
Weissman, M.D.,)
)
Defendants.)
)

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Martin J. Bishop and Daniel A. Dingerson of Foley & Lardner LLP (“Counsel”), pursuant to Local Rule 83.17, respectfully move this Court for leave to withdraw their appearances as counsel of record for Defendants Lake Forest Partners, LLC (“Lake Forest”) and Christopher T. French (“French”). In support of their motion, Counsel states as follows:

1. Due to a lack of cooperation from Lake Forest and French, and the failure by Lake Forest and French to comply with the terms of Foley & Lardner LLP’s representation, Counsel requests this Court’s permission to withdraw their appearances and cease and desist their representation of Lake Forest and French in this action.
2. Counsel has notified French and Lake Forest (through French) of its intention to seek leave to withdraw as counsel in this action via numerous e-mails and telephone calls beginning on March 13, 2008.
3. Counsel has notified Lake Forest and French of this motion by sending, via e-mail and overnight mail, a copy of this motion to the following addresses:

Lake Forest Partners, LLC
249 Market Square
Lake Forest, IL 60045

Christopher T. French
739 Timber Ridge
Fontana, WI 53125.

4. Counsel has advised Lake Forest and French of all pending deadlines in this case.

WHEREFORE, Martin J. Bishop and Daniel A. Dingerson of Foley & Lardner LLP respectfully request that this Court enter an order:

- a. granting Martin J. Bishop and Daniel A. Dingerson leave to withdraw their appearances as counsel of record for Lake Forest and French; and
- b. providing any and all other and further relief as this Court deems just and proper.

Dated: March 18, 2008

Respectfully submitted,

/s/ Daniel A. Dingerson
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*Attorneys for Defendants Lake Forest
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